

Circular 72-14

January 28, 1972

U.S. DEPARTMENT OF LABOR  
MANPOWER ADMINISTRATION

Bureau of Apprenticeship  
and Training  
Washington, D.C. 20210

Distribution

BAT-6  
BAT-7

SUBJECT

CODE: 501

EEO In Apprenticeship--  
Monitoring State Plans in  
State Agency States  
29 CFR Part 30, as amended

Purpose - To advise BAT staff in State Apprenticeship Agency or Council States of policies and procedures for reporting and monitoring performance of such Agency or Council in Equal Employment Opportunity in Apprenticeship progress.

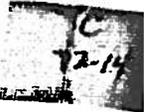
Background - Sec. 30.15 (a) (3) of the regulations require the Department (BAT) to determine on a continuing basis the effectiveness of State Agencies or Councils in implementing the requirements of 29 CFR Part 30 as amended.

The Regulations and State Plans require that adequate records be maintained. Individual State Plans make provisions for semi-annual reports to the Department. Status report forms such as the BAT 105 and 107 will be helpful, but will not provide sufficient information for monitoring to determine the progress and effectiveness of a State Plan.

In monitoring the State's performance as a whole, it will be necessary to have some knowledge of (1) how, and on what basis, the State Agency makes its determinations as to the EEO status of each account or program, (2) the adequacy of affirmative action plans which it approves or disapproves, (3) its exercise of exemption granting authority, (4) effectiveness in program compliance reviews, (5) distribution of copies of the State Plan to sponsors and other aspects of implementing the plan.

Records should be kept by such State Apprenticeship Council or Agency that will provide adequate information for use when filing its performance report at the end of each six month reporting period.

The BAT EEO Manual or suitable one developed by the SAC for that state should be provided to all BAT and SAC representatives serving accounts in that state.



Reports and Records Required

The report shall include program and apprentice action information identical to that provided by the BAT 105 form, supplemented by other statistical and narrative reports.

Records and reports should provide information such as listed below and be forwarded to the State Supervisor, for transmittal to Regional Directors and the Office of Special Activities.

1. Minimum standards for acceptance of programs for registration--this report to be filed only with original report unless revisions are made at a later date.
2. Registration actions--First report to include all presently registered programs. After initial report, report only those programs registered during current six month reporting period. All programs to be identified by sponsor's name, address, type of program, and number of apprentices.
3. Program deregistration actions taken during six months reporting period. Give sponsor's name, address, type of program, number of apprentices. Reason for such action shall also be noted.
4. Records should disclose names of programs undergoing compliance review or investigation and results of such review or investigation.

(A written report of same must be maintained by SAC for forwarding to appropriate BAT office for review if requested).

5. Individual program ethnic count and apprentice actions (registration, terminations, completions).\*
6. Total registered apprentice count for State for reporting period, including ethnic breakdown.\*

\* BAT 105 form may be used to provide this information.

7. List of programs and sponsors receiving exemptions-- partial or whole and period of time for which exemption was granted, including addresses, type of program, specific exemption granted and number of apprentices.
8. List of programs and sponsors having exemption withdrawn by state agency and reasons for such action, including addresses, type of program and number of apprentices.
9. Names of program sponsors against whom complaints have been filed, and date of complaint and status of complaint at time report is filed and disposition of complaints.

All reports are due on a semi-annual basis on June 30, and December 31st starting June 30, 1972.

Failure to provide the report to the appropriate State Supervisor within fifteen working days after due date of report may be considered cause for derecognition of the Council or Agency for not complying with this requirement. The affected State Supervisor shall on the first working day after the close of business of the fifteenth working day of the period, advise the Regional Director of the failure to receive such reports. The Regional Director shall advise the Administrator in writing on or before the 25th day of the same month of such failure to file required reports. The Administrator will determine action to be taken.

Action required - Regional Directors and State Supervisors should be familiar with Chapter 7 of the BAT EEO Manual covering State Plans or appropriate State EEO Manual and the provisions for record keeping and reporting contained in the plan for their state, and conclude reporting arrangements and discuss monitoring plans with the proper State Agency officials as soon as possible.

Discussions should include:

1. Promote the use of BAT forms 105 and 107, if the state has not adopted these reporting forms.

2. The records and reporting sections of the State Plan to assure understanding and cooperation. Provision for BAT to review 105's and 107's filed by State apprenticeship representatives with the State Director or appropriate official.
3. Provisions for receiving reports from the State Agency
  - a. In states with state staff
  - b. In states where BAT handles all accounts
  - c. How, when and where reports are to be filed and distribution of copies.
  - d. Provision for review of exemptions granted under the State Plan with the State Director or appropriate official.

**Note:** SAC states adopting BAT 105 and BAT 107 forms should request a supply through BAT State Supervisors. Upon request from a state agency, the BAT national office will assist in training state staffs in the preparation of the above forms.

MTOS/EF

**Enclosure:** Copy of letter from Administrator Murphy to each State Apprenticeship Agency/Council Executive Officer.

U.S. DEPARTMENT OF LABOR  
MANPOWER ADMINISTRATION  
WASHINGTON, D.C. 20210



Dear

In order that the Bureau may fulfill its assigned responsibilities under Title 29 CFR Part 30, as amended and to enable it to provide adequate national statistics on Equal Employment Opportunity in Apprenticeship we must have certain comprehensive reports from each State Apprenticeship Agency. Provision for this is found in Section 30.8, parts (d) and (e) of Title 29 CFR Part 30, as amended, Section 8 or that Section entitled "Records" of your approved State Plan and Section 7, part IV of the Bureau's 29 CFR 30 Manual on Equal Employment Opportunity in Apprenticeship and Training. The necessary reports are listed on the attachment to this letter.

These reports are to be forwarded to the Bureau's State Supervisor in your State prior to the close of business of the fifteenth working day of the months of July and January of each fiscal year.

I have instructed our State Supervisor and Regional Director to confer with you and complete arrangements for your making these necessary reports. If any problems arise please feel free to contact me or our Office of Special Activities.

Sincerely,

HUGH C. MURPHY  
Administrator  
Bureau of Apprenticeship  
and Training

(Copy of letter and attachment sent to each State Apprenticeship Agency by BAT Administrator)

REPORTS REQUIRED TO PROVIDE ADEQUATE STATISTICS ON PROGRESS  
IN IMPLEMENTING PROVISIONS OF CFR 29, PART 30 AS AMENDED

1. Copy of Minimum standards established by your agency for acceptance for registration of an Apprenticeship program. (This report in triplicate to be filed only one time unless revisions are made by the agency at a later date).
2. Registration actions for reporting period. The first report shall include the names of all presently registered programs. After your initial report has been filed report only those programs registered during the current reporting period. All programs shall be identified by sponsor's name, address, type of program, and number of apprentices.
3. Deregistration actions taken during reporting period. Give sponsor's name, address, type of program, number of apprentices. Reason for such action shall also be noted.
4. Names of programs undergoing compliance review or investigation and results of such review of investigation. A written report of same must be maintained by SAC for forwarding to BAT for review if requested.
5. Individual program ethnic count and apprentice actions (registration, terminations, completions). (BAT #105 report use is recommended)
6. Total registered apprentice count for State for reporting period, including ethnic breakdown (Bureau #105 report)
7. List of programs and sponsors receiving exemptions--partial or whole and period of time for which exemption was granted, including addresses, type of program and number of apprentices.
8. List of programs and sponsors having exemption withdrawn by state agency and reasons for such action, including addresses, type of program and number of apprentices.
9. Names of program sponsors against whom complaints have been filed, and date of complaint and status of complaint at time report is filed and disposition of complaints.